

1 Honorable James L. Robart  
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8 UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

10 THE HUMAN RIGHTS DEFENSE  
11 CENTER and MICHELLE DILLON,

12 Plaintiffs,  
13 v.  
14 U.S. DEPARTMENT OF HEALTH AND  
15 HUMAN SERVICES, ADMINISTRATION  
FOR CHILDREN AND FAMILIES, and  
OFFICE OF REFUGEE RESETTLEMENT,  
16 Defendants.

No. 2:18-cv-01442-JLR

**JOINT STATUS REPORT AND  
[PROPOSED] ORDER**

Noted on Motion Calendar  
**October 9, 2019**

18 Plaintiffs THE HUMAN RIGHTS DEFENSE CENTER (“HRDC”) and  
19 MICHELLE DILLON (collectively, “Plaintiffs”) and Defendants U.S. DEPARTMENT OF  
20 HEALTH AND HUMAN SERVICES, ADMINISTRATION FOR CHILDREN AND  
21 FAMILIES and OFFICE OF REFUGEE RESETTLEMENT (collectively, “Defendants”)  
22 hereby provide the Court with a Joint Status Report pursuant to the Court’s September 12,  
23 2019 Order (Dkt. No. 38).

24 Since the last Joint Status Report, filed on September 10, 2019, the Defendants have  
25 produced what they represent to be all spreadsheet summaries of responsive Serious  
26 Incident Reports. Defendants have also indicated that they anticipate making an interim

1 production of claim and complaint records responsive to Plaintiffs' Freedom of Information  
2 Act requests before the end of October and that they anticipate all such responsive records  
3 will be produced within 90 days.

4 Plaintiffs currently are evaluating the spreadsheet summaries of Serious Incident  
5 Reports. Plaintiffs are also awaiting both the interim and final production of claim and  
6 complaint records.

7 \* In light of Defendants' representation that all Serious Incident Report spreadsheet  
8 summaries have been produced and that responsive claim and complaint documents will be  
9 produced within 90 days, and in light of the Plaintiffs' ongoing evaluation of the documents  
10 produced to date and anticipated evaluation of the documents to be produced, the parties  
11 propose that a joint status report be filed approximately 90 days from today, on or before  
12 January 9, 2020.

13 Dated: October 9, 2019

14 Respectfully submitted,

15 **ARETE LAW GROUP PLLC**

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20 **HUMAN RIGHTS DEFENSE CENTER**

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26 *Attorneys for Plaintiffs The Human Rights  
Defense Center and Michelle Dillon*

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2           **BRIAN T. MORAN**  
3           United States Attorney

4           By: /s/ Michelle R. Lambert  
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13           *Attorneys for Defendants*

1 [PROPOSED] ORDER *JLR*

2 It is hereby ORDERED that:

3 The parties shall submit a joint status report to the Court on or before January 9,  
4 2020.

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6 Dated this 15 day of October, 2019

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9 Honorable James L. Robart  
10 United States District Court Judge  
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2                   **CERTIFICATE OF SERVICE**  
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6 I hereby certify that on this date, I electronically filed the foregoing document with  
7 the Clerk of the Court using the CM/ECF system, which will send notification of such filing  
8 to the following:  
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19                   *Attorneys for Defendants*

20                   DATED: October 9, 2019, at Seattle, Washington.  
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23                   \_\_\_\_\_  
24                   s/ *Annabel Barnes*  
25                   Annabel Barnes, Legal Assistant  
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